

# EXHIBIT P

Civil Action File No. 5:23-mc-00001-LGW-BWC  
*Plaintiff Coalition for Good Governance's Reply to Defendant's Response to  
Motion for Sanctions*

**From:** Charles Dial charles.dial@coffeecounty-ga.gov  
**Subject:** Re: additional documents needed for Curling litigation  
**Date:** August 24, 2022 at 5:10 PM  
**To:** Jennifer Dorminey Herzog jherzog@hallboothsmith.com  
**Cc:** Vickers, Tracie Tracie.Vickers@coffeecounty-ga.gov, Rachel Roberts Rachel.Roberts@coffeecounty-ga.gov, Vickers, Wesley Wesley.Vickers@coffeecounty-ga.gov, arowell@hallboothsmith.com, Nick Kinsley NKinsley@hallboothsmith.com, Stephen Delk SDelk@hallboothsmith.com

Jennifer this is all correct.

Thanks

Charles Dial  
 SGCCE, INC

Sent from my iPhone

On Aug 24, 2022, at 4:56 PM, Jennifer Dorminey Herzog <jherzog@hallboothsmith.com> wrote:

Charles/Wesley/tracie: plaintiff's counsel has requested the following, can you please assist me to be sure my responses are accurate.

1. Please confirm my whether Coffee County has a backup server or archived data that would contain Ms. Hampton's emails. IT support has confirmed that the former Election Supervisor Misty Hampton's and Jill Riddlehoover's email accounts are no longer accessible. Coffee County has a limited number of licenses available under Microsoft 365, and it was the regular practice of IT to replace the new employee of each position with that license when a former employee of the same position was for whatever reason no longer employed by the county, and when that is done, unless previously archived, the former employees' emails are no longer accessible. In this situation, the County did attempt to preserve Hampton's emails, as you will see in documents provided previously to Ms. Marks, but IT unfortunately was unsuccessful in same. The County has since implemented an email archiving system. I have been advised that IT has exhausted all efforts and despite same, advised that Hampton's emails are not accessible or recoverable.
2. Please confirm the County has searched the desktop computers and any other electronic equipment in the Elections Office for all responsive documents. ?? Can I confirm this?

## Jennifer Dorminey Herzog

Attorney at Law | Hall Booth Smith, P.C.

O: 229.382.0515 1564 King Road  
 D: 229.339.8856 Tifton, GA 31793  
 hallboothsmith.com



ALABAMA | ARKANSAS | COLORADO | FLORIDA | GEORGIA  
 MONTANA | NEW JERSEY | NEW YORK | OKLAHOMA  
 NORTH CAROLINA | SOUTH CAROLINA | TENNESSEE

CONFIDENTIALITY NOTICE: This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy the original message and any copies.